

Commonwealth of Kentucky
Division for Air Quality
PERMIT STATEMENT OF BASIS

Operating, Title V/PSD – Draft Permit No. V-03-024
CTNA Manufacturing LLP
One General Street
Mayfield, Kentucky 42066
October 30, 2003
Eric Brown, Reviewer
Plant I.D. #: 21-083-00006
Application Log #: 51193

SOURCE DESCRIPTION:

An operating permit application was received from CTNA Manufacturing LLP on December 14, 1999 and was called complete on February 11, 2000. The applicant proposes to operate seven (6) natural gas-fired indirect heat exchangers. These heat exchangers consist of 3-37.5 mmBtu/hr units, a 75 mmBtu/hr unit, a 112.50 mmBtu/hr unit, and a 150 mmBtu/hr unit. In addition, source will operate several paint spray booths and tire manufacturing operations. The tire manufacturing operations have a maximum operating rate of 48,735 lbs/hr of finished rubber product.

COMMENTS:

Based on the information provided, the Division concluded that Regulation 401 KAR 59:015 applies to the new indirect heat exchangers that were constructed after 1972, and Regulation 401 KAR 61:015 applies to the existing indirect heat exchangers constructed before 1972. Regulation 401 KAR 59:010, applies to the new process operations after 1975, and 61:020 applies to the existing process operations before 1975. Regulation 401 KAR 60:005, incorporating by reference 40 CFR 60, subpart BBB, applies to the tread tuber and extrusion line

Emissions were calculated based on AP 42(7/98) table 1-4. The results of the analysis are summarized in the air quality analysis and indicate that the standards will not be exceeded. Since this review has disclosed that all requirements will be met, the preliminary determination is that an operating permit may be issued as conditioned, but contingent to the satisfactory resolution of any adverse public comments which might be received. Additional information used in making this review was obtained from existing agreed limitations on file records.

APPLICABLE REGULATIONS:

401 KAR 51:017, Prevention of significant deterioration (PSD) of air quality.

401 KAR 59:010, New Process Operations.

401 KAR 59:015, New Indirect Heat Exchangers applicable to an emission unit with a capacity less than 250 mmBTU per hour and commenced on or after April 9, 1972.

40 CFR 60, Subpart BBB-Standards of Performance for the Rubber Tire Manufacturing Industry.

40 CFR 60, Subpart Kb- Standards of Performance for Volatile Organic Liquid Storage Vessels for Which Construction, Reconstruction, or Modification Commenced after July 23, 1984, applicable to Tank #'s 3 and 4

401 KAR 61:015, Existing Indirect Heat Exchangers applicable to an emission unit with a capacity

less than 250 mmBTU per hour and commenced before April 9, 1972.

401 KAR 61:020, Existing Process Operations.

401 KAR 63:021, Existing sources emitting toxic air pollutants.

NON-APPLICABLE REGULATIONS DUE TO APPLICABILITY DATE OR SIZE OF THE UNIT:

401 KAR 60:005, New Source Performance Standards, incorporating by reference 40 CFR 60 Subpart Db, Standards of performance for industrial-commercial-institutional steam generating units applicable to an emission unit of greater than 100 mmBTU/hour and constructed after June 19, 1984. The indirect heat exchanger (emission unit 84) was relocated from Waco Texas plant to be re-installed in Kentucky. The unit was permitted under the 401 KAR 51:017, Prevention of Significant Deterioration (PSD) [C-90-092] since there was a significant emission increase for nitrogen oxide (NO_x).

401 KAR 60:005, New Source Performance Standards incorporating by reference 40 CFR 60 Subpart Dc, Standards of performance for small industrial-commercial-institutional steam generating units, applicable to an emission unit with a design maximum heat input capacity of 100 mmBTU/hour or less and greater than or equal to 10 mmBTU/hour and constructed after June 9, 1989.

EMISSION AND OPERATING CAPS DESCRIPTION:

None

OPERATIONAL FLEXIBILITY:

None

CREDIBLE EVIDENCE:

This permit contains provisions that require that specific test methods, monitoring or recordkeeping be used as a demonstration of compliance with permit limits. On February 24, 1997, the U.S. EPA promulgated revisions to the following federal regulations: 40 CFR Part 51, Sec. 51.212; 40 CFR Part 52, Sec. 52.12; 40 CFR Part 52, Sec. 52.30; 40 CFR Part 60, Sec. 60.11 and 40 CFR Part 61, Sec. 61.12, that allow the use of credible evidence to establish compliance with applicable requirements.

At the issuance of this permit, Kentucky has not incorporated these provisions in its air quality regulations.